

EXHIBIT B

Subject: Re: Bocker Matter - Dutchess Cty NY
Date: Monday, January 10, 2022 at 4:02:26 PM Eastern Standard Time
From: Laurie Alberts Salita
To: Smith, Kevin, Mike Miska, fgw@browngavalas.com, dsr@rutherfordchristie.com
CC: Gallagher, Robyn E., Kenny, Michael Jr., kyamaguchi@kmazuckert.com, griddle@andersonriddle.com, jkiser@andersonriddle.com, pal@lopal.com, als@lopal.com, mbernstein@thesandersfirm.com, roche@litchfieldcavo.com, ricci@litchfieldcavo.com, tcascione@cpglawyers.com, cdevers@airlaw.com, sdiorio@connellfoley.com, mcrowley@connellfoley.com, lschneider@tresslerllp.com, jdew@cohenkinne.com, chennessey@cohenkinne.com, toche@litchfieldcavo.com, Will Skinner, Mackenzie W. Smith, giuseppe.aguanno@mendes.com, abrooks@wilks.law, vgreco@airlaw.com
Attachments: image001.jpg, image002.jpg, image003.png, image008.jpg, image009.png, image663666.png

Dear Mike, We understand that some parties may wish to proceed with an inspection, and in that regard, I can confirm that our experts are currently available on the March 21-24 dates provided by Textron subject to a few potential conditions/complications:

1. Like Textron, Continental requires written confirmation from all parties that its objections to personal jurisdiction in NY are not waived by such participation; and
2. If discovery in the NY and DE cases is stayed when March 21st arrives, Continental may object to moving forward and may seek alternative dates. In other words, by offering that Continental is currently free on March 21-24 dates, we do not necessarily consent to proceeding on those dates and/or waive any rights to object if discovery is stayed in both cases at that time.

Many thanks,

LAURIE ALBERTS SALITA
PHILADELPHIA
101 Lindenwood Drive, Suite 225
Malvern, PA, 19355
484.875.3159 *direct*
salita@skinnerlawgroup.com



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WWW.SKINNERLAWGROUP.COM

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From: Kevin Smith <KSmith@wiggin.com>
Date: Monday, January 10, 2022 at 2:39 PM
To: Mike Miska <mmiska@airlaw.com>, "fgw@browngavalas.com" <fgw@browngavalas.com>, "dsr@rutherfordchristie.com" <dsr@rutherfordchristie.com>, Laurie Alberts Salita <salita@skinnerlawgroup.com>
Cc: "Gallagher, Robyn E." <RGallagher@wiggin.com>, "Kenny, Michael Jr." <MKenny@wiggin.com>, "kyamaguchi@kmazuckert.com" <kyamaguchi@kmazuckert.com>, "griddle@andersonriddle.com" <griddle@andersonriddle.com>, "jkiser@andersonriddle.com" <jkiser@andersonriddle.com>, "pal@lopal.com" <pal@lopal.com>, "als@lopal.com" <als@lopal.com>, "mbernstein@thesandersfirm.com" <mbernstein@thesandersfirm.com>, "roche@litchfieldcavo.com" <roche@litchfieldcavo.com>, "ricci@litchfieldcavo.com" <ricci@litchfieldcavo.com>, "tcascione@cpglawyers.com" <tcascione@cpglawyers.com>, "cdevers@airlaw.com" <cdevers@airlaw.com>, "sdiorio@connellfoley.com" <sdiorio@connellfoley.com>, "mcrowley@connellfoley.com" <mcrowley@connellfoley.com>, "lschneider@tresslerllp.com" <lschneider@tresslerllp.com>, "jdew@cohenkinne.com" <jdew@cohenkinne.com>, "chennessy@cohenkinne.com" <chennessy@cohenkinne.com>, "toche@litchfieldcavo.com" <toche@litchfieldcavo.com>, "Will S. Skinner" <skinner@skinnerlawgroup.com>, "Mackenzie W. Smith" <smith@skinnerlawgroup.com>, "giuseppe.aguanno@mendes.com" <giuseppe.aguanno@mendes.com>, "abrooks@wilks.law" <abrooks@wilks.law>, "vgreco@airlaw.com" <vgreco@airlaw.com>
Subject: RE: Bocker Matter - Dutchess Cty NY

Mike:

Happy New Year. Unfortunately, the February dates do not work. Your email did not address whether or not your client is willing to agree that Textron's participation in an inspection would not waive its jurisdictional defense. We presume that you and all other parties are willing to so stipulate, but we need written confirmation. Also, as I think you know, the filing of the jurisdictional motion stays discovery in NY. Nonetheless, subject to other parties' views and ability, Textron could be available for an inspection March 21-24. Please let us know if we should hold those dates.

Kevin

Kevin M. Smith

Direct: 203.498.4579 | ksmith@wiggin.com
www.wiggin.com



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From: Mike Miska <mmiska@airlaw.com>
Sent: Thursday, December 30, 2021 3:55 PM
To: Smith, Kevin <KSmith@wiggin.com>; fgw@browngavalas.com; dsr@rutherfordchristie.com; salita@skinnerlawgroup.com
Cc: Gallagher, Robyn E. <RGallagher@wiggin.com>; Kenny, Michael Jr. <MKenny@wiggin.com>; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com; jkiser@andersonriddle.com; pal@lopal.com;

als@lopal.com; mbernstein@thesandersfirm.com; roche@litchfieldcavo.com; ricci@litchfieldcavo.com;
tcascione@cpglawyers.com; cdevers@airlaw.com; sdiorio@connellfoley.com;
mcrowley@connellfoley.com; lschneider@tresslerllp.com; jdew@cohenkinne.com;
chennessy@cohenkinne.com; toche@litchfieldcavo.com; skinner@skinnerlawgroup.com;
smith@skinnerlawgroup.com; giuseppe.aguanno@mendes.com; abrooks@wilks.law; vgreco@airlaw.com

Subject: RE: Bocker Matter - Dutchess Cty NY

Kevin:

We would like to proceed with the inspection. Can you advise if the February dates are acceptable?

Thank you,

Mike Miska, Esq.
THE WOLK LAW FIRM
1710-12 Locust Street
Philadelphia, PA 19103
mmiska@airlaw.com
p: 215.545.4220
f: 215.545.5252



From: Smith, Kevin <KSmith@wiggin.com>
Sent: Tuesday, December 21, 2021 9:04 AM
To: Mike Miska <mmiska@airlaw.com>; fgw@browngavalas.com; dsr@rutherfordchristie.com; salita@skinnerlawgroup.com
Cc: Gallagher, Robyn E. <RGallagher@wiggin.com>; Kenny, Michael Jr. <MKenny@wiggin.com>; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com; ikiser@andersonriddle.com; pal@lopal.com; als@lopal.com; mbernstein@thesandersfirm.com; roche@litchfieldcavo.com; ricci@litchfieldcavo.com; tcascione@cpglawyers.com; Cynthia Devers <cdevers@airlaw.com>; sdiorio@connellfoley.com; mcrowley@connellfoley.com; lschneider@tresslerllp.com; jdew@cohenkinne.com; chennessy@cohenkinne.com; toche@litchfieldcavo.com; skinner@skinnerlawgroup.com; smith@skinnerlawgroup.com; giuseppe.aguanno@mendes.com; abrooks@wilks.law
Subject: RE: Bocker Matter - Dutchess Cty NY

p.s. All, please also include my colleague Robyn Gallagher, copied here, on future correspondence. Thank you.

Kevin M. Smith
Direct: 203.498.4579 | ksmith@wiggin.com
www.wiggin.com



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From: Smith, Kevin <KSmith@wiggin.com>

Sent: Monday, December 20, 2021 8:56 PM

To: Mike Miska <mmiska@airlaw.com>; fgw@browngavalas.com; dsr@rutherfordchristie.com; salita@skinnerlawgroup.com

Cc: jshupe@schnader.com; rwilliams@schnader.com; lschmeer@schnader.com; Kenny, Michael Jr. <MKenny@wiggins.com>; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com; jkiser@andersonriddle.com; pal@lopal.com; als@lopal.com; mbernstein@thesandersfirm.com; roche@litchfieldcavo.com; ricci@litchfieldcavo.com; tcascione@cpglawyers.com; cdevers@airlaw.com; sdiorio@connellfoley.com; mcrowley@connellfoley.com; lschneider@tresslerllp.com; jdew@cohenkinne.com; chennessey@cohenkinne.com; toche@litchfieldcavo.com; skinner@skinnerlawgroup.com; smith@skinnerlawgroup.com; giuseppe.aguanno@mendes.com; abrooks@wilks.law

Subject: RE: Bocker Matter - Dutchess Cty NY

Mike,

Thank you for reaching out. Textron also objects to moving forward with the inspection while the motions to dismiss are pending. That said, Textron may be willing to proceed in February (we are not available in January) assuming all parties acknowledge and agree, in writing, that Textron would not be waiving its personal jurisdiction objection by participating in a wreckage inspection. Assuming that all parties will consent that participation is not a waiver, Textron is investigating the feasibility of the proposed February dates and will revert.

Kevin

Kevin M. Smith

Direct: 203.498.4579 | ksmith@wiggins.com
www.wiggins.com



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From: Mike Miska <mmiska@airlaw.com>

Sent: Thursday, December 16, 2021 4:19 PM

To: fgw@browngavalas.com; dsr@rutherfordchristie.com; salita@skinnerlawgroup.com

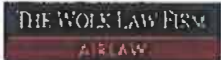
Cc: jshupe@schnader.com; rwilliams@schnader.com; lschmeer@schnader.com; Kenny, Michael Jr. <MKenny@wiggins.com>; Smith, Kevin <KSmith@wiggins.com>; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com; jkiser@andersonriddle.com; pal@lopal.com; als@lopal.com; mbernstein@thesandersfirm.com; roche@litchfieldcavo.com; ricci@litchfieldcavo.com; tcascione@cpglawyers.com; cdevers@airlaw.com; sdiorio@connellfoley.com; mcrowley@connellfoley.com; lschneider@tresslerllp.com; jdew@cohenkinne.com; chennessey@cohenkinne.com; toche@litchfieldcavo.com; skinner@skinnerlawgroup.com; smith@skinnerlawgroup.com; giuseppe.aguanno@mendes.com; abrooks@wilks.law

Subject: RE: Bocker Matter - Dutchess Cty NY

WARNING! External email. Do not click/open unexpected links/attachments.

Thank you, Fred. If possible I'd like to keep the original dates. We will try and amass the responses we receive and settle upon the most convenient date. Our hope in noticing January was that it would give ample advance notice.

Mike Miska, Esq.
THE WOLK LAW FIRM
1710-12 Locust Street
Philadelphia, PA 19103
mmiska@airlaw.com
p: 215.545.4220
f: 215.545.5252



From: Fred G. Wexler <fgw@browngavalas.com>
Sent: Thursday, December 16, 2021 4:18 PM
To: David S. Rutherford <dsrc@rutherfordchristie.com>; Mike Miska <mmiska@airlaw.com>; 'Laurie Alberts Salita' <salita@skinnerlawgroup.com>
Cc: jshupe@schnader.com; rwilliams@schnader.com; lschmeer@schnader.com; mkenney@wiggin.com; ksmith@wiggin.com; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com; ikiser@andersonriddle.com; pal@lopal.com; als@lopal.com; mbernstein@thesandersfirm.com; roche@litchfieldcavo.com; ricci@litchfieldcavo.com; tcascione@cpglawyers.com; Cynthia Devers <cdevers@airlaw.com>; sdiorio@connellfoley.com; mcrowley@connellfoley.com; lschneider@tressierllp.com; idew@cohenkinne.com; chennessy@cohenkinne.com; toche@litchfieldcavo.com; Will Skinner <skinner@skinnerlawgroup.com>; Mackenzie W. Smith <smith@skinnerlawgroup.com>; Aguanno, Giuseppe <Giuseppe.Aguanno@mendes.com>; Andrea Brooks <abrooks@wilks.law>
Subject: RE: Bocker Matter - Dutchess Cty NY

Mike,

We are not available on February 9 and 10, but can be available February 15 through 18 subject to our expert's availability.

Fred

Fred G. Wexler
Brown Gavalas & Fromm LLP
(212)983-8500

From: David S. Rutherford <dsrc@rutherfordchristie.com>

Sent: Thursday, December 16, 2021 3:46 PM

To: Mike Miska <mmiska@airlaw.com>; 'Laurie Alberts Salita' <salita@skinnerlawgroup.com>

Cc: jshupe@schnader.com; rwilliams@schnader.com; lschmeer@schnader.com; mkenney@wiggin.com; ksmith@wiggin.com; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com;

jkiser@andersonriddle.com; pal@lopal.com; als@lopal.com; mbernstein@thesandersfirm.com;

roche@litchfieldcavo.com; ricci@litchfieldcavo.com; tcascione@cpglawyers.com; Cynthia Devers

<cdevers@airlaw.com>; sdiorio@connellfoley.com; mcrowley@connellfoley.com;

lschneider@tresslerllp.com; idev@cohenkinne.com; chennessy@cohenkinne.com; Fred G. Wexler

<fgw@browngavalas.com>; toche@litchfieldcavo.com; Will Skinner <skinner@skinnerlawgroup.com>;

Mackenzie W. Smith <smith@skinnerlawgroup.com>; Aguanno, Giuseppe

<Giuseppe.Aguanno@mendes.com>; Andrea Brooks <abrooks@wilks.law>

Subject: RE: Bocker Matter - Dutchess Cty NY

Both the January dates and the February dates work for Berkshire.

From: Mike Miska <mmiska@airlaw.com>

Sent: Thursday, December 16, 2021 3:35 PM

To: 'Laurie Alberts Salita' <salita@skinnerlawgroup.com>

Cc: jshupe@schnader.com; rwilliams@schnader.com; lschmeer@schnader.com; mkenney@wiggin.com; ksmith@wiggin.com; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com;

jkiser@andersonriddle.com; pal@lopal.com; als@lopal.com; mbernstein@thesandersfirm.com;

roche@litchfieldcavo.com; ricci@litchfieldcavo.com; tcascione@cpglawyers.com; Cynthia Devers

<cdevers@airlaw.com>; sdiorio@connellfoley.com; mcrowley@connellfoley.com;

lschneider@tresslerllp.com; idev@cohenkinne.com; chennessy@cohenkinne.com; David S. Rutherford

<dsr@rutherfordchristie.com>; fgw@browngavalas.com; toche@litchfieldcavo.com; Will Skinner

<skinner@skinnerlawgroup.com>; Mackenzie W. Smith <smith@skinnerlawgroup.com>; Aguanno,

Giuseppe <Giuseppe.Aguanno@mendes.com>; Andrea Brooks <abrooks@wilks.law>

Subject: RE: Bocker Matter - Dutchess Cty NY

Laurie:

Thank you for your email. As you know our office is always willing to accommodate scheduling issues, but I am not willing to cancel an inspection without alternative dates in place. Moreover, regardless of the delay you hope to gain through your personal jurisdiction challenge in New York, Continental remains a defendant in Delaware action, and I see no reason for delaying this unnecessarily.

With that said, would Feb. 9-10 work in lieu of Jan 17-18?

If any of the parties desire to attend remotely, we will work with ATS to make those arrangements.

Very truly yours,

Mike Miska, Esq.
THE WOLK LAW FIRM
1710-12 Locust Street
Philadelphia, PA 19103
mmiska@airlaw.com
p: 215.545.4220
f: 215.545.5252



From: Laurie Alberts Salita <salita@skinnerlawgroup.com>
Sent: Monday, December 13, 2021 4:37 PM
To: Mike Miska <mmiska@airlaw.com>
Cc: jshupe@schnader.com; rwilliams@schnader.com; lschmeer@schnader.com; mkenney@wiggin.com; ksmith@wiggin.com; kyamaguchi@kmazuckert.com; griddle@andersonriddle.com; ikiser@andersonriddle.com; pal@lopal.com; als@lopal.com; mbernstein@thesandersfirm.com; roche@litchfieldcavo.com; ricci@litchfieldcavo.com; tcascione@cpglawyers.com; Cynthia Devers <cdevers@airlaw.com>; sdiorio@connellfoley.com; mcrowley@connellfoley.com; lschneider@tresslerllp.com; idev@cohenkinne.com; chennessy@cohenkinne.com; dsr@rutherfordchristie.com; fgw@browngavalas.com; toche@litchfieldcavo.com; Will Skinner <skinner@skinnerlawgroup.com>; Mackenzie W. Smith <smith@skinnerlawgroup.com>; Aguanno, Giuseppe <Giuseppe.Aguanno@mendes.com>; Andrea Brooks <abrooks@wilks.law>
Subject: Bocker Matter - Dutchess Cty NY

Dear Mike – please see the attached correspondence.

And, by copy to all counsel, we look forward to working with everyone. If you happen to notice that we have inadvertently omitted anyone involved in the pending NY lawsuits from the distribution list, please feel free to let me know, and I will promptly correct the same.

Have a good evening,

LAURIE ALBERTS SALITA
PHILADELPHIA
101 Lindenwood Drive, Suite 225
Malvern, PA, 19355
484.875.3159 *direct*
salita@skinnerlawgroup.com



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